

**STINSON LLP**

Richard J.L. Lomuscio  
100 Wall Street, Suite 201  
New York, New York 10005  
Telephone: (646) 883-7471  
[richard.lomuscio@stinson.com](mailto:richard.lomuscio@stinson.com)

*Attorneys for i360, LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION,  
*as assignee*, JANE DOE-1, *a law enforcement*  
*officer*, JANE DOE-2, *a law enforcement*  
*officer*, EDWIN MALDONADO, SCOTT  
MALONEY, JUSTYNA MALONEY,  
PATRICK COLLIGAN, PETER  
ANDREYEV, and WILLIAM SULLIVAN,

Plaintiffs,

v.

i360, LLC, RICHARD ROES 1-10, *fictitious*  
*names of unknown individuals* and ABC  
COMPANIES 1-10, *fictitious names of*  
*unknown entities*,

Defendants.

Civil Action No.: 1:24-cv-04345-HB

**NOTICE OF MOTION FOR *PRO HAC*  
VICE ADMISSION OF NICOLE  
KHALOUIAN**

**PLEASE TAKE NOTICE** that, pursuant to Local Rule 101.1(c) of the United States District Court for the District Court of New Jersey, Defendant i360, LLC ("Defendant"), by and through its undersigned counsel respectfully requests *pro hac vice* admission of Nicole Khalouian from the law firm Stinson LLP to represent it in this matter.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Defendant shall rely upon the supporting Certification of Richard J.L. Lomuscio and Certification of Nicole Khalouian submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of order is also submitted herewith.

Dated: March 27, 2025

Respectfully submitted,

By: /s/ Richard J.L. Lomuscio  
Richard J.L. Lomuscio  
STINSON LLP  
100 Wall Street, Suite 201  
New York, New York 10005  
Telephone: (646) 883-7471  
[richard.lomuscio@stinson.com](mailto:richard.lomuscio@stinson.com)

*Attorneys for i360, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 27, 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of the District Court via the Court's CM/ECF system, which sent notice of electronic filing to all counsel of record.

Dated: March 27, 2025

By: /s/ Richard J.L. Lomuscio  
Richard J.L. Lomuscio